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22 Attorneys for Defendants JPMORGAN CHASE BANK, N.A.; CALIFORNIA  
 23 RECONVEYANCE CO.; and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

26 EMIL P. MAILYAKOV;  
 27 MAGDALENA A. APOSTOLOVA

28 Plaintiffs,

v.

JP MORGAN CHASE, N.A.; HSBC BANK  
 29 USA, NA; CALIFORNIA  
 30 RECONVEYANCE CO.; PAUL  
 31 FINANCIAL, LLC; MORTGAGE  
 32 ELECTRONIC REGISTRATION SYSTEMS,  
 33 INC (MERS); FOUNDATION  
 34 CONVEYANCING, LLC; AND DOES 1  
 35 THROUGH 100,

36 Defendants.

Case No. 11-cv-2066-EDL

37 **STIPULATION REGARDING  
 38 DEADLINE TO FILE RESPONSIVE  
 39 PLEADING; [PROPOSED] ORDER**

40 **[CIVIL L.R. 6-2]**

41 Judge: Honorable Elizabeth D. Laporte

1 **STIPULATION**

2 Plaintiffs Emil P. Milyakov and Magdalena A. Apostolova and Defendants JPMorgan  
3 Chase Bank, N.A., California Reconveyance Co., and Mortgage Electronic Registration Systems,  
4 Inc. (collectively “the parties”), by and through their counsel of record, hereby stipulate and agree  
5 as follows:

6 WHEREAS,

7 1. Defendants’ responsive pleading is due May 16, 2011.  
8 2. The parties are engaged in discussions to resolve this matter amicably.  
9 3. The parties have requested no previous extension of time and the extension  
10 requested herein is not requested for the purposes of delay and will not result in prejudice to the  
11 parties or the Court.

12 4. A trustee’s sale of the property located at 106 Madrid Street, San Francisco,  
13 California, which is the subject of this action, is currently scheduled for July 6, 2011.

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BRYAN CAVE LLP  
Two EMBARCADERO CENTER, SUITE 1410  
SAN FRANCISCO, CA 94111-3907

1 NOW, THEREFORE

2 1. Defendants shall file a responsive pleading on or before July 19, 2011.  
3 2. Defendants shall postpone the trustee's sale if the parties have not reached an  
4 amicable resolution before July 6, 2011.

5 **IT IS SO STIPULATED.**

6 The content of this document is acceptable to all persons who have signed below.

7 Dated: May 16, 2011

Ganka Hadjipetrova

8 9 By: /s/ Ganka Hadjipetrova  
Ganka Hadjipetrova

10 Attorney for Plaintiffs EMIL P. MILYAKOV  
11 AND MAGDALENA A. APOSTOLOVA

12 Dated: May 16, 2011

**BRYAN CAVE LLP**

13 14 By: /s/ Robert J. Esposito  
15 Robert J. Esposito

Deborah Goldfarb

Glenn Plattner

16 Attorneys for Defendants  
17 JPMORGAN CHASE BANK, N.A.;  
18 CALIFORNIA RECONVEYANCE CO.; and  
19 MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS, INC.

20 **[PROPOSED] ORDER**

21 Pursuant to the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

22 May 18, 2011

23 Date

